



Devon Countryside Access Forum

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Local Plan Review
Spatial Planning and Delivery
Forde House
Brunel Road
Newton Abbot
TQ12 4XX

12 July 2018

Dear Sir/Madam

Local Plan Review: Issues Consultation

The Devon Countryside Access Forum (DCAF) is a local access forum under the Countryside and Rights of Way Act 2000 (CROW Act). Its statutory remit is to give independent advice “as to the improvement of public access to land in the area for the purposes of open-air recreation and the enjoyment of the area...”

The DCAF currently has seventeen members, appointed by Devon County Council, who represent the interests of landowners/managers, access users and other relevant areas of expertise such as conservation and tourism.

The DCAF has confined its comments to Question 25 which falls within the remit of its work and this response will be on the agenda for formal approval at the next meeting in October.

Question 25. Is tailoring the provision of green infrastructure to the specific requirements of an area a suitable approach?

Tailoring the provision of green infrastructure to the specific requirements of an area, using the Fields in Trust standards, would appear to be a suitable approach but the Devon Countryside Access Forum advises that there are several questions which need to be addressed in developing this policy:

- 1) The commentary identifies that, “with regard to quantity of open space within the District, there is an under-supply of parks and garden, amenity greenspace, play provision and allotments and, there is an over-supply of natural and semi-natural open space.” The provision of larger areas which may not meet Fields in Trust walking distance accessibility standards e.g. of the type of Dawlish Warren, Decoy

Country Park and Dawlish Countryside Park are also important. There may be situations in which a larger area of green infrastructure to serve several local areas may be more critical and valuable. An 'over-supply' should not mean that further areas of natural and semi-natural space are ignored in any future planning application process.

- 2) The impact of visitors and the tourism economy should be a factor in assessing the need for provision, an issue which extends beyond the population growth anticipated from any development. This is particularly the case in coastal communities in Teignbridge. It would be helpful for the Local Plan to recognise that additional green infrastructure may be required.
- 3) The supporting strategies and policies will need to specify what is meant by "an area" or "local". Will the Local Plan specify the green infrastructure provision necessary for each development site, or will it instead state the factors which are to be taken into consideration? Will these be general or site-specific?
- 4) A Local Plan has to provide certainty to developers and others, and it also must be evidence-based. It would be helpful to know how the authority proposes to approach this in relation to green infrastructure.
- 5) The Fields in Trust standards for informal outdoor space are per head of population. The DCAF advises that allocations of space and type of informal outdoor space might need to recognise the requirements for different groups, for example the percentage of children compared to the number of children's informal play areas and the number of areas that are accessible to disabled people. Research shows men and women use outdoor space differently, for example there are more male cyclists and more horse riders are women. Use of informal outdoor space should consider provision for a range of access users such as walkers, dog walkers, disabled users, cyclists and horse riders.
- 6) The Fields in Trust standards refer to quality guidelines but these are vague. The DCAF would like to know how quality will be determined, assessed and monitored?
- 7) The DCAF has previously expressed concerns about funding streams for long-term maintenance of such sites after initial provision. This is an aspect which needs to be considered.

The Devon Countryside Access Forum trusts that its comments will be taken into account and would welcome feedback.

Yours faithfully



Hilary Winter
Forum Officer

Letter sent on behalf of Devon Countryside Access Forum

Chair: Sarah Slade Vice Chair: Chris Cole